

## **PART 2 - REMOVAL DQOs**

### ***REM.1 Removal Starts***

#### **Section 1 - Program Activity Information**

1.1 Program Activity: Number of Removal Starts

1.2 Program Activity Category: GPRA Annual Performance Goal

1.3 Program Area: Removal

1.4 EPA Sponsor:

<b>Subject Matter Expert</b>	<b>Subject Area</b>	<b>Phone #</b>
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#### **Section 2 - Problem/Decision Objective**

2.1 Problem: Protection of human health and the environment is the highest priority for the Superfund program. The goal of EPA's emergency response and removal program is to provide quick response to immediate threats to public health and the environment from releases of hazardous substances whenever and wherever they occur. Removal actions are responses performed at NPL and non-NPL sites that eliminate or reduce threats to public health or the environment from the release, or potential release, of hazardous substances or pollutants or contaminants which may pose an imminent and substantial danger to public health or welfare. These risk reduction activities have critical indicators of emergency, time-critical, or non-time critical (NTC) removal actions. The number of removal starts provides a mechanism for tracking EPA's progress in meeting this high priority goal.

2.2 Stakeholder(s): The public and EPA, including HQ and the Regions.

2.3 Decision-maker(s): EPA, State, tribal government, or their contractors who begin work at a site for construction of the removal. The RPM, IMC or other regional

2.4 Decision: Track each removal action at sites in WasteLAN. A site is addressed by a removal action when the EPA, Response Action Contract (RAC), Superfund Technical Assistance and Response Team (START) contract, Emergency and Rapid Response Services (ERRS), State, or PRP, or their contractors, have mobilized for construction of the removal action specified in the Action Memorandum. The Removal starts when the EPA, State, tribal government, or their contractors have begun work at a site for construction of the removal as documented by a Pollution Report (POLREP). Removal starts are documented in WasteLAN by entry of a Removal, PRP Removal, or PRP Emergency Removal action with an actual start date.

Removal Starts will be tracked and reported by lead as follows:

- Fund-financed (lead code = F-fund financed, TR, or S) actions. EPA, State or their contractors have begun work at a site for construction of the removal (emergency, time-critical, or non-time critical) as documented by a Pollution Report (POLREP). The date of on-site construction is reported in WasteLAN as the removal (Action Name = Removal Action) actual start date (Actual Start).
- PRP- financed from a Special Account (SA - performed by EPA, SS - performed by the State, or ST - performed by Tribal Government lead) actions. EPA, State, tribal government or their contractors have begun work at a site for construction of the PRP-financed removal (emergency, time-critical, or non-time critical) as documented by a Pollution Report (POLREP). The date of on-site construction is reported in WasteLAN as the removal (Action Name = Removal Action) actual start date (Actual Start).
- PRP-financed (RP or MR-lead) actions under the terms of an AOC, UAO, CD, or judgment. PRPs or their contractors have begun work on-site for construction of the removal (emergency, time critical, or non-time critical) as documented in a POLREP AND the PRPs provide written notice of intent to comply with a UAO, or an enforcement instrument has been signed by EPA and the PRPs, or a judgment has been signed by a Federal judge. The date of on-site construction is reported in WasteLAN as the removal (Action Name = PRP Removal) actual start date (Actual Start). The following information must be entered into WasteLAN for the enforcement instrument:
  - ▶ The date the AOC (Action Name = Admin Order on Consent) was signed by the PRPs and the designated Regional official (Actual Complete), and the Response Acts Pd by Parties of "PRP Removal"; or
  - ▶ The date (Actual Complete) the PRPs provide notice of intent to comply (Action Name = PRP Notify EPA of Intent to Comply) with a UAO for a RP-lead removal signed (Actual Complete) by the designated Regional official (Action Name = Unilateral Admin Order), and the Response Acts Pd by Parties of "PRP Removal"; or
  - ▶ The date the Regional Administrator signs the memorandum transmitting the CD (Action Name = Consent Decree) to DOJ or HQ and the Response Acts Pd by Parties of "PRP Removal"; or
  - ▶ The date a judgment (Action Name = Judicial/Civil Judgment) was signed by the Federal judge (Actual Complete), and the Response Acts Pd by Parties of "PRP Removal."
- PRP-financed (PS-lead actions) actions under terms of a State Order or decree. The PRPs or their contractors have begun work on-site for construction of the removal (emergency, time critical, or non-time critical) as documented in a Pollution Report (POLREP) and the State enforcement instrument has been signed by the appropriate State official.
- PRP-financed (RP-lead) emergency actions where no enforcement instrument exists - The PRP or their contractors have begun construction work on-site in response to an emergency incident, and EPA provides on-site technical oversight and/or is part of an incident command system/unified command (as documented in a POLREP). The date of construction is reported in WasteLAN as the removal (Action Name = PRP Emergency Removal), actual start date (Actual Start).

For both Fund (F) and PRP (RP)-financed removals, the following additional information must be entered into WasteLAN: Critical Indicator classification for the removal [(1) Time Critical, (2) Non-Time Critical, or (3) Emergency]; Media addressed through the removal (Media Type); Media Name; Response Action being conducted (Selected Response Actions); Response Action Cost Data; Institutional Control information; and Five Year Review information (at NPL sites only).

An endangerment determination should be documented when an Action Memo or Removal Action Decision Document or an enforcement instrument is prepared. Regions identify which of the documents contain the endangerment determination when they enter the actual completion date (Actual Complete) for the corresponding action into WasteLAN.

### Section 3 - Information Needs

Name	Source	System	Table/Column
Site ID		WasteLAN	site.site_id
Removal action	OSCP, RPMs, POLREP	WasteLAN	uaction.rat_code/act_code_id where rat_code = PJ
Actual Start date	OSCP, RPMs, POLREP	WasteLAN	uaction.act_actl_start_date is NOT null
Action Lead		WasteLAN	uaction.ralt_code = RP or PS or MR
Critical Flag Code		WasteLAN	uaction.ract_critical_flag_code = 1 or is null
Anomaly Code	OSCP, RPMs, POLREP	WasteLAN	uaction.raa_code NOT in PS or PB or TN or TT or OA or OS
NPL Status		WasteLAN	site.rnpl_status_code = 'P' or 'F' or 'D' or 'R' or 'S' or 'N' or 'W'

### Section 4 - Scope/Universe

Removal starts are counted at NPL or non-NPL sites. Each removal start action must have a critical indicator of emergency, time-critical, or non-time critical (NTC).

### Section 5 - Data Quality Requirements

5.1 Completeness: Required data in order to credit for a Removal start are the Critical Indicator, Media addressed, the specific Media Name, Response Actions that will be taken in the Removal, valid lead, and institutional control objective if ICs are anticipated for the media addressed. The DQO addresses all NPL and non-NPL sites for which a completed Removal action (as defined by action codes listed in #3 above) start has been entered into WasteLAN. The actual start date will define the Fiscal Year and quarter in which the Removal started.

5.2 Accuracy: The Removal start date should be accurate to the day that construction work began as documented by the POLREP.

Most accurate - Data is reported in official decision source document. There is objective evidence (documentation that a third party can examine and arrive at the same conclusion) to support the accomplishment of this measure.

5.3 Timeliness: Removal start dates should be entered by the fifth working day after the removal has begun.

5.4 Consistency: Guidance on this measure is provided in the Superfund Program Implementation Manual (SPIM) OSWER 9200.3-14-IG-Q. In addition, the appropriate use of Special Account funds for removal actions is provided in the “Guidance on Key Decision Points in Using Special Account Funds” dated September 28, 2001.

Most Consistent - National Guidance and definitions have been distributed

## **Section 6 - Information Collection and Reporting**

6.1 Source for the information: Pollution Report, OSCP, RPM

6.2 User interface: RPMs enter Removal actions and POLREP actions and their actual start/completion dates on the Removal Project Schedule in WasteLAN. Users are prompted to enter all the appropriate information based on the Start/Complete date for the action. Response action data is entered via the Removal Response Summary screen. Media information is added in the Add/Edit Media screen.

6.3 System transfers: Removal action/date information is snapshot from regions to EPA Headquarters nightly. Extracts from CERCLIS are sent to various other internal and external web-based services.

6.4 Internal outputs: SCAP 14, SCAP 15

6.5 Audit Reports:

6.6 External outputs: reported annually to Congress, Envirofacts (via extracted data from CERCLIS).

6.7 Guidance Documentation:

- ▶ Superfund Program Implementation Manual (SPIM) – OSWER Directive 9200.3-14-1G-Q
- ▶ Removal Starts Screen Quick Reference Guide